

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

In re:)
)
PAUL TRANSPORTATION, INC.,) Bankruptcy No. 10-13022-NLJ
) Chapter 11
Debtor.)

OBJECTION TO ADEQUACY OF DISCLOSURE STATEMENT

QUALCOMM INCORPORATED (“Qualcomm”), pursuant to 11 U.S.C. § 1125, hereby objects to the adequacy of *Paul Transportation, Inc.’s Disclosure Statement* filed December 15, 2010 (docket #249) (the “Disclosure Statement”), which was filed contemporaneously with *Paul Transportation, Inc.’s Plan of Reorganization* (docket #250) (the “Plan”).

1. The Disclosure Statement is inadequate in the following respects:

A. There is insufficient business justification for the extraordinarily odd “default” provision in the Plan (page 14-15 of 46). The default provision is nearly incomprehensible and, as a practical matter, would be unenforceable by a creditor.

B. It is unclear what amounts unsecured creditors may expect to receive over time, and so will be impossible for an unsecured creditor to determine if the Debtor complies with any plan which may be confirmed.

2. Qualcomm reserves the right to join in any other objections to the Disclosure Statement.

WHEREFORE, Qualcomm prays that the Court deny approval of the Disclosure Statement unless it is amended to resolve the foregoing concerns, and that the Court grant Qualcomm such other and further relief as may be just and proper.

Dated: January 14, 2011.

/s/ Andrew R. Turner
Andrew R. Turner, OBA #9125
CONNER & WINTERS, LLP
4000 One Williams Center
Tulsa, Oklahoma 74172-0148
(918) 586-8972, fax (918) 586-8672

Attorneys for Creditor
QUALCOMM INCORPORATED

CERTIFICATE OF SERVICE

I hereby certify that on January 14, 2011, a copy of the foregoing instrument was served by CM/ECF upon all parties in interest, including the following:

Matthew Goodin
Stephen W. Elliott
Kline, Kline, Elliott & Bryant, P.C.
Attorneys for the Debtor

/s/ Andrew R. Turner
Andrew R. Turner